REMARKS

Claims 1-34, 52-78 and 195-200 are pending. Claims 1, 17, 26, 52, 66 and 73 have been amended to overcome the 35 USC 112 rejection and not to overcome the prior art. No new matter is presented.

Claims 1, 17, 26, 52, 66 and 73 stand rejected under 35 USC 112, second paragraph, as being indefinite. This rejection is respectfully traversed.

The Examiner maintains that these claims are indefinite because the targeted media object is targeted separately from other media objects but also presented simultaneously with said other media objects. Because the Examiner deemed these claims indefinite, he has interpreted this limitation as meaning targeting a plurality of products or services simultaneously to a user based on the user's profile. Applicants respectfully submit that the Examiner has misunderstood the claimed subject matter and interpreted the claims incorrectly as a result.

Targeting a media object is an act which is separate from presented a media object to a user. In the act of targeting a media object, the apparatus may choose many users who fulfill a certain criteria which would make it desirable to target a certain media object to those users. For instance, if a group of users drive sports cars, one would want to target advertisements for sports cars to those users. If one of those users also listens to classical music and another listens to rock music, one would target the classical listener for media objects related to classical music and the rock listener for media objects related to rock music. Thus, the sports car advertisements and the classical music content may be targeted separately, but to the same user. Then, if both of those media objects were transmitted to the sports car/classical listener users, those media objects would be presented simultaneously, even though they were targeted separately. Applicants submit that one of ordinary skill in the art would certainly understand the scope of the invention as claimed.

With regard to the antecedent basis problems pointed out by the user, Applicants have amended the claims to clarify the invention. Applicants respectfully request that this rejection be withdrawn.

Claims 1-34, 52-57, 61-78 and 195-200 stand rejected under 35 USC 103(a) as being unpatentable over Picco if view of Libman (U.S. Patent No. 6,076,072). This rejection is respectfully traversed.

The Examiner admits that Picco fails to disclose the limitation "wherein the targeted media object is part of a program composition comprising multiple media objects presented simultaneously and the targeted media object is targeted separately from at least one other media object in the composition" as recited in the claims. The Examiner, however, has relied upon Libman as disclosing this feature of the claim.

The Examiner's reliance on Libman is based on his erroneous interpretation of the claims. Even if Libman discloses targeting different products or services to a user based on the user's profile and simultaneously displaying the products or services to the user's client device, as asserted by the Examiner, this is not what is claimed in the independent claims. The fact is that neither Picco or Libman, either alone or in combination, teach or suggest the limitation of "wherein the targeted media object is part of a program composition comprising multiple media objects presented simultaneously and the targeted media object is targeted separately from at least one other media object in the composition." Accordingly, Applicants request that this rejection be withdrawn.

Claims 58-60 stand rejected under 35 USC 103(a) as being unpatentable over Picco in view of Libman and further in view of Oliver (U.S. Patent No. 6,480,885). This rejection is respectfully traversed.

As stated above, the features of the independent claims are not taught or suggested by Picco or Libman, either alone or in combination. Oliver fails to overcome the deficiencies of

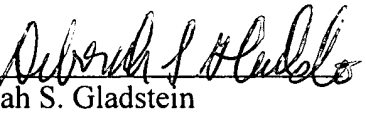
Picco and Libman. Thus, claims 58-60 are allowable at least due to their respective dependencies. Applicants request that this rejection be withdrawn.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. If it is determined that a telephone conference would expedite the prosecution of this application, the Examiner is invited to telephone the undersigned at the number given below.

In the event the U.S. Patent and Trademark Office determines that an extension and/or other relief is required, applicants petition for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to **Deposit Account No. 03-1952** referencing docket no. **559442004400**.

Dated: September 5, 2006

Respectfully submitted,

By 

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